Souhegan Designated River Proposed Water Management Plan written comments
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At the end of the public hearing in Milford, Wayne Ives of DES pointed out that their standard was set by legislation to be habitat preservation and it would be nice if no other interests were harmed in the process. Wayne Ives elaborated that the standard for habitat preservation was 100% rather than consider how only 50% of the habitat could be preserved or how one could define preserving habitat to the 50% level.

It appears that the definition of “100% habitat” is based on the species mix that evolved, or would evolve, along the Souhegan River in the absence of human activities. Given the way life and evolution work, the species mix will expand and adapt to need all of the river water resources at critical, bottleneck, times. These critical times are generally low flow periods in dry spells when local agriculture needs water and would want to withdraw it from the river.

So it seems obvious to me that there is a logical contradiction between 100% habitat preservation and agricultural water use. If the 100% habitat preservation standard is followed to its logical end, one would have to conclude that there is no room for significant human activity in the watershed.

However, from the proposal to release water from storage reservoirs up river, we know that habitat preservation is a selective activity. Some habitats and species are sacrificed to preserve other habitats and species. Specifically, changing the way those dams are operated will cause habitat changes in and around those ponds.

Another way to look at this is to accept that human activities in the watershed are going to change the habitat, and then consider what species mix will populate the altered habitat. There is already a considerable level of human activity in the watershed which has changed the habitat. And yet your average layman looking at the river will consider it healthy. I believe that the technical experts who studied the river would also consider the river to be healthy.

Even with a healthy river at current levels of human activity, the proposed Water Management Plans (WMPs) and Water Use Plans (WUPs) aim to reduce water withdrawals at critical times. The implementation costs, including large wells, storage ponds, growing different crops, and risking crop failure during droughts, are significant, likely well over $1 million if we take into account all water users including golf courses.

The proposed WMPs and WUPs plans, because they are based on the 100% habitat preservation standard, are too extreme and unnecessarily costly. A

better and more cost-effective balance would be attained by defining adequate habitat at levels that allow for local agriculture, at least, to withdraw significant water during dry spells. The actual size of the Souhegan watershed is an historical accident, and therefore the species population mix that adapted to river flow rates from that watershed is also an historical accident. To the extent that local agriculture withdraws water, the lower stretches of the river will appear in some ways as though the watershed is somewhat smaller. The species population mix will adapt, the river will be healthy in a different way, and people who live around here will have the benefits of more local food production and related employment opportunities.